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ACCREDO HEALTH GROUP, INC.,  
MEDCO HEALTH SOLUTIONS, INC.,  
SMITHS MEDICAL ASD, INC.  
formerly known as  
SMITHS MEDICAL MD, INC.

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

TAMARA MAYNARD, JOSEPH MAYNARD, and SEAN MAYNARD,	)	CASE NO.	3:09-cv-04564-JL
	)		
	)	(Removed from San Francisco County	
Plaintiffs,	)	Superior Court - Case No. CGC-09-	
vs.	)	484970)	
	)		
ACCREDO THERAPEUTICS, INC.,	)	Assigned:	Hon. Magistrate Judge
DELTEC, INC., and DOES 1 through 50,	)		James Larson
inclusive,	)	Department:	Courtroom F, Fl. 15
	)		
Defendants.	)	<b>STIPULATION AND JOINT REQUEST</b>	
	)	<b>TO EXTEND CASE MANAGEMENT</b>	
	)	<b>SCHEDULE</b>	
	)		
	)	Action Filed:	February 13, 2009
	)	Trial Date:	None
	)	Motion Cutoff:	September 30, 2011
	)	Discovery Cutoff:	March 1, 2011

Pursuant to Civil L.R. 16-2(d), Plaintiffs and Defendants, by and through their undersigned counsel, hereby stipulate and jointly request that all deadlines in the Case Management Schedule be extended an additional two (2) months.

As grounds for this request, the parties would show that they have been

diligently conducting written discovery and document production. This discovery has included voluminous document production from Defendants Smiths Medical ASD, Inc. and Accredo Therapeutics, Inc., and discovery of voluminous medical records pursuant to authorizations provided by Plaintiffs. Through no fault of Plaintiffs or Defendants, there has been an unexpected delay in the acquisition of complete medical records from one key provider, Enloe Medical Center. Enloe Medical Center provided medical care to the decedent with regard to pulmonary hypertension, and the parties expect that it possesses important and relevant documents. Enloe Medical Center's production of records initially included only medical bills, but no medical records. Defendants are awaiting production of the medical records from this provider.

Given the claims and issues involved in this case, the parties have had to refrain from proceeding with fact depositions until all relevant medical records have been obtained. Once those records are received, the parties will move forward to complete discovery in this case.

Accordingly, the parties hereby stipulate to and jointly request the following Case Management Schedule:

Discovery cutoff: 5/2/2011

Expert Deadlines: 7/4/2011 for Plaintiffs' Expert Disclosures

8/19/2011 for Plaintiffs' trial experts deposed

9/19/2011 for Defendants' trial experts disclosed

11/4/2011 for Defendants' trial experts to be deposed

Dispositive Motions: 12/2/2011 with a hearing date of early January

The parties are to decide on a joint ADR process at or around May 2, 2011.

1 DATED this 14<sup>th</sup> day of February, 2011

2 BOWMAN AND BROOKE LLP

3  
4 By: s/Shane V. Bohnen  
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15 known as SMITHS MEDICAL MD, INC.

16 DATED this 14<sup>th</sup> day of February, 2011

17 LAW OFFICES OF JOHN  
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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 SAN FRANCISCO DIVISION**

<p>TAMARA MAYNARD, JOSEPH MAYNARD,          and SEAN MAYNARD,</p> <p style="text-align: center;">Plaintiffs,</p> <p style="text-align: center;">vs.</p> <p>ACCREDO THERAPEUTICS, INC.,          DELTEC, INC., and DOES 1 through 50,          inclusive,</p> <p style="text-align: center;">Defendants.</p>	<p>) CASE NO. 3:09-cv-04564-JL</p> <p>)</p> <p>) (Removed from San Francisco County</p> <p>) Superior Court - Case No. CGC-09-</p> <p>) 484970)</p> <p>)</p> <p>) Assigned: Hon. Magistrate Judge</p> <p>) James Larson</p> <p>) Department: Courtroom F, Fl. 15</p> <p>)</p> <p>) <b><del>PROPOSED</del> AMENDED CASE</b></p> <p>) <b>MANAGEMENT SCHEDULE</b></p> <p>)</p> <p>) Action Filed: February 13, 2009</p> <p>) Trial Date: None</p> <p>) Motion Cutoff: None</p> <p>) Discovery Cutoff: None</p> <p>)</p> <p>) Date: September 29</p> <p>) Time: 10:30 a.m.</p> <p>) Ctrm: Courtroom F, Fl. 15</p>
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PURSUANT TO STIPULATION, IT IS SO ORDERED that the Case  
 Management Schedule be amended as follows:

Discovery cutoff: 5/2/2011

Expert Deadlines: 7/4/2011 for Plaintiffs' Expert Disclosures

8/19/2011 for Plaintiffs' trial experts deposed

9/19/2011 for Defendants' trial experts disclosed

11/4/2011 for Defendants' trial experts to be deposed

Dispositive Motions: 12/2/2011 with a hearing date of early January

The parties are to decide on a joint ADR process at or around May 2, 2011.

DATED: February 14, 2011



HONORABLE JAMES LARSON  
UNITES STATES MAGISTRATE JUDGE